

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of)	FCC 04-171
)	
Notice of Proposed Rulemaking)	WT Docket No. 04-257
)	RM-10743
Amendment of the Commission's Rules Concerning)		
Maritime Communications)	29 September 2004

COMMENTS OF THE NATIONAL GMDSS TASK FORCE

The National Implementation Task Force for the Global Maritime Distress and Safety System (GMDSS) supplements government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at www.navcen.uscg.gov/marcomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

The Task Force desires to comment on the Commission's Notice of Proposed Rule Making regarding increased flexibility for AMTS and VPC stations. In general, we concur with providing additional flexibility for those stations as long as the availability of International Maritime VHF spectrum is not impacted. The maritime community is still

suffering from the loss of spectrum when portions of the international band were reallocated to Land Mobile many years ago. The Task Force regards that reallocation as especially unfortunate in that it derogated an international frequency plan used by virtually all international shipping arriving in U.S. waters rendering those channels unavailable for their use.

Now that the Maritime VHF system has matured, there are many requirements that cannot be met within the remaining allocation. In particular, there is an immediate need for additional Port Operations channels to meet the new demands for homeland security. The duplex Port Operations channels withdrawn earlier for assignment to Land Mobile services would have been especially appropriate for this function. Lacking the availability of those channels in the near term, the Task Force advocates making the unused Public Correspondence channels available for Port Operations in either a simplex or duplex mode until such time as the International Maritime VHF Band can be restored to its full planned functionality in the U.S. In particular, the Task Force fully concurs that you “should align allocation of this spectrum with that of the ITU with respect to use of the spectrum for port operations and ship movement services, in the interest of promoting compatibility with international shipping and increased flexibility.”

The Task Force also strongly endorses the Commission’s position that no rule changes “undermine the purpose of providing for the unique distress, operational, and personal communications needs of vessels at sea and on inland waterways” by enabling “a de facto reallocation or otherwise remove this spectrum from the maritime community.”

For the National GMDSS Implementation Task Force

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